

Geoffrey C. Gould
Vice President
Government &
Regulatory Affairs

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GTE Corporation

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June 29, 2000

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
12th Street lobby, TW-A325
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**Re: GTE Certification of Interstate Access Universal Service Support, CC
Docket No. 96-262, 94-1, 99-249, and 96-45**

Dear Ms. Salas:

GTE Service Corporation, on behalf of its affiliated domestic telephone operating companies ("GTE"), hereby certifies that all interstate access universal service support provided to GTE pursuant to Part 54.807 of the Commission's Rules will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. That is, to make explicit support that was previously implicit in interstate access rates, and to keep subscriber line charges associated with local telephone service affordable.

GTE is an eligible telecommunications carrier (ETC) consistent with section 254(e) of the Telecommunications Act of 1996. A listing of GTE Operating Companies with ETC status is being provided for which this certification applies.

Sincerely,

Geoffrey C. Gould
Vice President – Government & Regulatory Affairs
GTE Corporation

Attachment:

cc: Robert Haga – Universal Service Administrative Company

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List ABCDE

GTE Network Services

As of June 30, 2000

Attachment I

ETC Study Areas

NECA CODE

COSA CODE

1	Alabama
2	Alabama (Contel)
3	Alaska
4	Arkansas
5	Arkansas (Contel)
6	Arkansas (KS DBA AR)
7	California
8	California - Arizona (Contel)
9	California - Nevada (Contel)
10	California (Contel)
11	California (West Coast)
12	Florida
13	Hawaii
14	Idaho
15	Illinois
16	Illinois (Contel)
17	Illinois (GSI)
18	Indiana
19	Indiana (Contel)
20	Indiana (CSI)
21	Iowa
22	Iowa (Contel)
23	Iowa (KS DBA IA)
24	Kentucky
25	Kentucky (Contel)
26	Michigan
27	Michigan (CSI)
28	Micronesia Tel.
29	Minnesota
30	Minnesota (Contel)
31	Missouri
32	Missouri - Eastern (Contel)
33	Missouri (Contel)
34	Missouri (C.S.)
35	Nebraska
36	New Mexico
37	New Mexico (Contel)
38	North Carolina
39	North Carolina (Contel)
40	Ohio
41	Oklahoma
42	Oregon
43	Pennsylvania
44	Pennsylvania (Contel QS)
45	Pennsylvania (Contel)
46	South Carolina
47	South Carolina (Contel)
48	Texas
49	Texas (Contel)
50	Virginia
51	Virginia (Contel)
52	Washington
53	Washington (Contel)
54	Wisconsin

250293
250281
613009
402080
401730
401790
542319
452302
552302
542302
542344
210328
623100
472416
341015
341036
343035
320772
320779
323034
351186
351207
351790
260407
260410
310695
313033
653700
361186
361140
421186
421789
421922
421846
371186
492080
492177
230479
230509
300615
432080
532416
170169
170201
170170
240479
240526
442080
442154
190479
190233
522416
522449
330886

GTAL
COAL
GTAK
GTAR
COAR
COSA
GTCA
COAZ
CONV
COCA
GNCA
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GTHI
GTID
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GTMC
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COMN
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COEM
COMO
COCM
GTNE
GTNM
CONM
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GTOK
GTOR
GTPA
COQS
COPA
GTSC
COSC
GTTX
COTX
GTVA
COVA
GTWA
COWA
GTWI

Gail L. Polivy
Assistant General Counsel



GTE Service Corporation

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Ms. Magalie R. Salas
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445 Twelfth Street, S.W.
Washington, DC 20554

**Re: GTE Request for Confidential Treatment of CALLS Line Count Data
Provided to USAC, CC Docket Nos. 96-262, 94-1, 99-249, and 96-45**

Dear Ms. Salas:

GTE Service Corporation, on behalf of its affiliated domestic telephone operating companies ("GTE"), pursuant to Section 0.459 of the Commission's Rules, 47 C.F.R. §0.459, requests that wire-center (WC) line counts summarized by UNE zone GTE is providing to USAC on June 30, 2000 not be made routinely available for public inspection. Pursuant to the Commission's *Sixth Report and Order¹ in the matter of Access Price Reform*, GTE must submit WC line count data for each of its UNE zones to USAC for the CALLS Program on June 30, 2000 and each quarter thereafter.

The information submitted in the Confidential version contains trade secrets or commercial or financial information that is confidential and disclosure to the public would likely cause competitive injury to GTE. See 5 U.S.C. §552(b)(4); *National Parks and Conservation Ass'n v. Morton*, 498 F.2d 765 (D.C. Cir. 1974); *National Parks and Conservation Ass'n v. Kleppe*, 547 F.2d 673 (D.C. Cir. 1976). The submission provided to USAC contains detailed information of GTE's facilities including highly sensitive information used in GTE's business plans. Disclosure of this information at the level of particular zone / wire center would reveal proprietary business information and would cause competitive harm to GTE. Competitors or potential competitors could use the information to evaluate operational and business plans. Disclosure of this information could undermine GTE's business interests and

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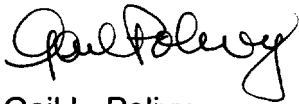
¹ *Sixth Report and Order in CC Docket Nos. 96-262, 94-1 Report and Order in CC Docket No. 99-249, and Eleventh Report and Order in CC Docket No. 96-45, FCC 00-193, released May 31, 2000.*

could have a significant, long-term, negative impact on the ability of GTE to effectively compete in its marketplace.

The Commission has previously recognized the proprietary nature of wire center specific line count data and has treated similar data submissions as confidential and protected from public disclosure.²

Accordingly, GTE asks that WC line count data by UNE zone provided to USAC be treated under the Commission's Rules as confidential.

Sincerely,



Gail L. Polivy
Attorney for GTE Service Corporation

cc: Katie King – Accounting Policy Division, 5-B550
John Ricker – USAC – Whippany, NJ

² See, e.g., *Order*, Federal-State Joint Board on Universal Service, CC Docket Nos. 96-45, 97-160, DA 99-1406 at ¶18, released Jul. 19, 1999.

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Thursday, June 29, 2000

01) REPLY

Document Date : 6/27/00

2000 Annual Access Tariff Filings

Filed By :

Iowa Telecommunications Services
SBC
Roseville Telco
BellSouth
NECA

02) COMMENTS

Document Date : 6/26/00

Docket # : CC 98-147 : Deployment of wireline services

Filed By :

CPI
Covad Communications

03) EMERGENCY MOTION FOR STAY

Document Date : 6/27/00

Petition for an Order directing the NANP administrator to assign NXX codes in Connecticut to Global Crossing Local Services

Filed By :

Global Crossing
Global Crossing - petition

04) COMMENTS

Document Date : 6/27/00

Echostar Satellite Corporation application for authority to make minor modifications to DBS authorizations

Filed By :

State of Alaska

ORDERS

05) FCC MEMORANDUM OPINION AND ORDER (DA 00-1452)

Docket # : NSD-L-00-46 : SWBell petitions for limited modification of LATA boundary to provide ELCS

Document Date : 6/29/00 between Blessing and El Campo in TX

06) FCC MEMORANDUM OPINION AND ORDER (DA 00-1453)

Document Date : 6/29/00

Docket # : NSD-L-00-47 : SWBell petition for limited modification of LATA boundary to provide ELCS between Laneville and Nacogdoches, TX

PUBLIC NOTICES

07) FCC PUBLIC NOTICE

Document Date : 6/29/00

Tariff Transmittal Public Reference Log

08) FCC PUBLIC NOTICE

Document Date : 6/29/00

Docket # : CC 92-237 : FCC announces next meeting of North American Numbering Council - 7/18/00

09) FCC PUBLIC NOTICE (DA 00-1451)

Document Date : 6/29/00

Docket # : ETC 00-22 : 4-DTV seeks determination of ETC status

Comments 07/19/2000

Replies: 07/26/2000

10) FCC PUBLIC NOTICE (DA 00-1450)

Document Date : 6/29/00

Docket # : ETC 00-21 : Reese Telecommunications seeks determination as ETC

Comments 07/19/2000

Replies: 07/26/2000

11) FCC PUBLIC NOTICE (DA 00-1457)

Document Date : 6/29/00

Foreign Carrier Affiliation notification

12) FCC PUBLIC NOTICE (DA 00-1456)

Document Date : 6/29/00

DIRECTV application to launch DBS space station

13) FCC PUBLIC NOTICE (DA 00-1449)

Document Date : 6/29/00

Due Diligence Announcement for upcoming 800 MHz spectrum auctions